

LAW OFFICE OF
ZACHARY MARGULIS-OHNUMA

May 11, 2016

Via ECF and email

David Gopstein, Esq.
Assistant United States Attorney
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

RE: U.S. v. Naray Palaniappan, 15 Cr. 485

Dear Mr. Gopstein:

This office represents the defendant Naray Palaniappan in the above-captioned case. I write pursuant to Rule 16 of the Federal Rules of Criminal Procedure to request the following materials:

1. Any and all documents or materials (including electronic materials) related to Mr. Palaniappan's polygraph examination conducted on September 3, 2015, including but not limited to FBI facility sign-in sheets, reports (including any and all draft polygraph reports), graphs, raw data, score sheets, statistical analysis, quality control materials, examiners' notes, audio or video recordings, electronically stored biophysical data, questions, control questions.

Please also identify the polygraphist and any supervisor or quality control manager who oversaw the exam.

2. Any and all documents or materials regarding the agency's procedures for administering and interpreting polygraph examinations, including but not limited to

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security procedures, training materials, and policy statements regarding polygraph examinations; and

3. Any and all documents indicating the polygraph examiner's training and authority to administer Mr. Palaniappan's polygraph examination, including but not limited to the examiner's curriculum vitae.

Finally, we request that the polygraph materials be sent to the Department of Defense National Center for Credibility Assessment to conduct a federal comprehensive quality control (QC) review. Such a quality control review has been requested in prior cases of mine with your office where, as here, the government sought to rely on or communicate polygraph results to the court.

Thank you for your attention to this case.

Very truly yours,

Zachary Margulis-Ohnuma

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CC: Clerk of Court (via ECF)

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